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Attorneys for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

FILTHY FUHRER, a/k/a “Fuck Face” f/k/a
“Timothy Lobdell,” ROY NAUGHTON,
a/k/a “Thumper,” GLEN BALDWIN, a/k/a
“Glen Dog,” COLTER O'DELL, CRAIG
KING, a/k/a “Oakie,” JUSTIN EATON,
a/k/a “Skulls,” and FELICIA KING,

Defendants.

No. 3:19-cr-00026-TMB-DMS

FILED UNDER SEAL

**EX PARTE MOTION TO SEAL INDICTMENT
AND DELAY ARRAIGNMENT AND ENTRY OF CASE INTO THE
ELECTRONIC FILING SYSTEM**

The United States asks the court to seal the First Superseding Indictment in this case and to delay its entry into the electronic filing system in accordance pursuant to Fed. R. Crim. P. 6(e)(4).

The First Superseding Indictment includes two previously uncharged defendants, Justin Eaton and Felicia King. While Eaton is in federal custody on another matter, Felicia King is at large, and upon information and belief, is unaware that she has become a target of the investigation.

Evidence indicates that at least one of the previously-charged defendants, Craig King, has remained in regular contact with Felicia King, and their conversations suggest that she is closely following developments in the case. Thus, if the existence of the investigation is revealed through public disclosure of any of the First Superseding Indictments prior to Felicia King's apprehension, it is likely that this information will quickly be disseminated, which in turn, will allow her to flee, destroy or conceal evidence, and prepare to violently resist arrest.

Accordingly, the United States asks the court to find that the public interest in access to the Indictment is outweighed by law enforcement interests, and to seal the First Superseding Indictment in this case and any associated arrest warrants, as well as to delay the arraignment of any co-defendant and the entry of the First Superseding Indictment into

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U.S. v. Fuhrer et al.
3:19-cr-00026-TMB-DMS

ECF, until November 6, 2020, at 5:00 p.m. If Felicia King is apprehended before that time, the government will promptly notify the court and file an appropriate motion to unseal.

RESPECTFULLY SUBMITTED October 21, 2020 at Anchorage, Alaska.

BRYAN SCHRODER
United States Attorney

/s James Klugman
JAMES KLUGMAN
Assistant United States Attorney
United States of America